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*Attorneys for Defendants Volkswagen Group of  
America, Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

TIMOTHY LEWIS, an individual;

Plaintiff,

v.

VOLKSWAGEN GROUP OF AMERICA,  
INC., a corporation; VOLKSWAGEN  
AKTIENGESELLSCHAFT, a business  
entity, form unknown; AND DOES 1  
through 20, inclusive,

Defendants.

Case No.: 2:16-cv-01732-APG-VCF

**STIPULATION AND ~~PROPOSED~~ ORDER  
TO EXTEND TIME**

Defendant Volkswagen Group of America, Inc. (“VWGoA” or “Defendant”), by and through its counsel of record, the law firm of Brownstein Hyatt Farber Schreck, LLP, and Plaintiff Timothy Lewis (“Plaintiff”), by and through the undersigned counsel of record, the law firm of Hyde & Swigart, hereby stipulate and agree as follows:

In order to conserve the resources of the parties, their counsel and the judiciary, Defendant shall have thirty (30) days to answer or otherwise respond to Plaintiff’s Complaint following entry of this Court’s decision on Defendant’s Motion to Stay (ECF No. 5).

BROWNSTEIN HYATT FARBER SCHRECK, LLP  
100 North City Parkway, Suite 1600  
Las Vegas, NV 89106-4614  
702.382.2101

Dated this 8th day of August, 2016.

BROWNSTEIN HYATT FARBER  
SCHRECK, LLP

By: /s/ Jeffrey S. Rugg  
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*Attorneys for Defendants Volkswagen Group  
of America, Inc.*

Dated this 8th day of August, 2016.

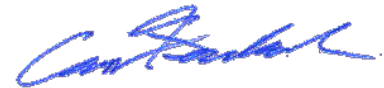
HYDE & SWIGART

By: /s/ Sara Khosroabadi  
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*Attorneys for Plaintiff Timothy Lewis*

IT IS HEREBY ORDERED that a status hearing  
is scheduled for 11:00 a.m., November 7, 2016,  
in courtroom 3D.

**IT IS SO ORDERED:**



UNITED STATES MAGISTRATE JUDGE

DATED: 8-8-2016

BROWNSTEIN HYATT FARBER SCHRECK, LLP  
100 North City Parkway, Suite 1600  
Las Vegas, NV 89106-4614  
702.382.2101

**CERTIFICATE OF SERVICE**

Pursuant to Fed.R.Civ.P.5(b), and Section IV of District of Nevada Electronic Filing Procedures, I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and that the foregoing **STIPULATION AND PROPOSED ORDER TO EXTEND TIME** was served via electronic service on the 8th day of August, 2016 and to the addresses shown below:

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/s/ Karen Wiehl

An employee of Brownstein Hyatt Farber Schreck, LLP